REMARKS

Applicant hereby responds to the office action of Feb. 10, 2006, in the above-referenced patent application. Claims 9-33 are pending in the application. Claims 15 and 16 were objected as being dependent on rejected base claims but deemed allowable if rewritten in independent form including limitations of base claims and any intervening claims.

Claims 9-33 were rejected on the ground of non-statutory obviousness-type double patenting as being unpatentable over claims 1-59 of USPN 6,466,971. Applicant files a terminal disclaimer to overcome this rejection.

Claims 9, 12, 17-22, 27-33 were rejected under 35 USC 103(a) as being unpatenable over Suzuki, T. et al., Teleoperation of multiple robots through the Internet, 5th IEEE International Workshop on Robot and Human Communications, November 11-14, 1996, pages 84-89 (hereinafter "Suzuki") in view of Fisher, Susan E., Get Ready For Plug and Play, Datamation, May 1, 1996, pages 62-64 (hereinafter "Fisher"). Claims 10, 14, 23, 26 were rejected under 35 USC 103(a) as being unpatenable over Suzuki and Fisher, and further in view of USPN 5,956,487 to Venkatraman et al. ("Venkatraman"). Claims 11, 13, 24-25 were rejected under 35 USC 103(a) as being unpatenable over Suzuki and Fisher, and further in view of Home Control Software, HomeVision by Custom Solutions, Inc., October 1996, pages 1-3 (hereinafter "HomeVision"). Rejection of claims 9-14 and 17-33 under 35 USC 103(a) is respectfully traversed because, for at least the following reasons, the references alone or in combination do

not disclose all of the claimed limitations. No prima facie case of obviousness has been established.

Rejection of Claims 9, 12, 17-22, 27-33 under 35 USC 103(a)

Rejection of Claims 9, 12, 17-22, 27-33 under 35 USC 103(a) as being unpatenable over Suzuki in view of Fisher is respectfully traversed because, for at least the following reasons, the references alone or in combination do not disclose all of the claimed limitations.

Regarding **Claim 9**, Suzuki is non-analogous art. Suzuki's human interface system for teleoperating multiple robots connected to a LAN, has nothing to do with a method for implementing command and control for home devices via a home network, as claimed. A room in a plant with robots in it where robots with cameras provide images, has nothing to do with the general understanding of a home network with home devices connected thereto, in the art. Further, the Examiner is respectfully directed to e.g. page 1, lines 12-21 where home devices, and a home network, according to the present invention are defined. It is respectfully submitted that the Examiner's characterization of Suzuki's robots and a controlling computer has home devices is squarely outside the definition of a home network and home devices in the specification. Suzuki does not disclose the steps of: "connecting a first home device to the home network; connecting a second home device to the home network, which is capable of being controlled by said first home device," as required by Claim 9. The Examiner is impermissibly reading limitations into Suzuki that are not supported by Suzuki. There is no mention of a home, a room in a home, a LAN in a home, robots in a home or robots in a room in a home. Teachings

of Suzuki cannot be applied to a home network for the reasons given above. If the claims are once again rejected, Applicant respectfully requests that the Examiner specifically reconcile the Examiner's interpretation of Suzuki and the aforementioned definitions in the specification of the present invention.

Further, it is respectfully submitted that despite the Examiner's characterization, Suzuki does not disclose: "accepting user input from a user by said first home device; and controlling the second home device by sending control and command information from the first home device to the second home device based on the user input," as required by Claim 9.

In Suzuki the operator commands a task (e.g., viewing an object) to an Operation Module without specifying which robot performs the task. Then, the Operation Module communicates with the robots to determine which robot(s) can perform the task, and commands those robot(s) to perform the task.

On page 85, right column, Suzuki describes the five modules as:

(1) a Presentation Interface Module that accepts commands given by the operator and shows the condition of the system,

(2) a Monitoring Module that gathers information in the system for monitoring purposes,

(3) a Dialog Module that is responsible for coordinating message exchange between the operator and the robots,

(4) an Operation Module that interprets commands into readable formats, and

(5) a Communication Module that converts information from other modules into uniform protocol among robots .

Suzuki describes the operation of the five modules in Section 5.1 on pages 86 and 87 in conjunction with Fig. 3, wherein Suzuki states that:

(1) in Step 1 a WWW server receives task commands from an operator,

(2) in Step 2 the WWW server invokes the Operation Module,

(3) in Step 3 the *Operation Module consults an operation database and determines necessary facilities and operations for the given task and allocates robots* available for the task,

(4) in Step 4 the Communication Module transmits commands to the available robots to perform the requested task,

(5) in Step 5 the available robots reply to the task request and the *Operation Module negotiates with those robots through the Communication Module to specify the robots that execute the task,*

(6) in Step 6 after the robots complete the tasks they send status data to the Monitoring Module through the Communication Module,

(7) in Step 7 the Monitoring Module saves that data and provides that data to the WWW server, and

(8) in Step 8 the WWW server presents that data in the Presentation Interface Module for the operator (emphasis added).

As is clear from the above passage, an operator does not control a robot, rather the Operation Module does. The operator specifies a task (e.g., "observing an object"), and does not control a specific robot from a control computer. Rather, the Operation Module in Step 3 above, negotiates with the robots and selects/controls the robots that can perform the task.

The Operation Module is a task manager that manages the robots to perform an operator requested task and ensures the cooperative operation of the robots. Suzuki does not allow an operator to control an individual robot for a task because it would interfere with Suzuki's system of simultaneous multi-robot operation. This is important because multiple operators (Fig. 2) can request tasks to be performed by the limited number of robots and the Operation Module ensures that the different tasks get done by the available robots. Otherwise, without the Operation Module, if multiple operators (see Fig. 3, multiple Presentation I/F Modules) control the same robot for a task, there would be contention. Further, if multiple robots are controlled by multiple operators without task scheduling and management by the Operation Module, the robots can, for example, physically collide into one another for example.

The Examiner states that Suzuki's presentation of images from each connected robot, along with a Dialogue Window for inputting commands directed to specific devices (Figure 4), shows controlling individual robots. It is respectfully submitted that the Examiner is misinterpreting Suzuki and its Figure 4, which only shows the fields: (1) images from each robot,

(2) bird's eye view of real environment, (3) graphical map of environment model, (4) control panel for individual robot, (5) dialogue window and (6) robot's status panel.

The only description of Suzuki's Figure 4 is on page 86, section 5.1 and on page 88, section 5.3, wherein none of the Examiner's interpretations of Suzuki are supported. In section 5.1 Suzuki states in relevant part: "The operator inputs task commands by selecting items in the menu, pushing buttons or clicking the object on the clickable map of HTML." Then, in section 5.3 Suzuki states in relevant part: "We execute an observation task with giving commands to the robots by clicking an object on the environment map shown in Fig. 4." As such, Suzuki clearly states that the operator *inputs tasks*, rather than direct individual robots for a task. As detailed above, it is the Operation Manager that selects robots based on a task input by the operator.

A reference cannot be interpreted in contradiction to the description in the reference itself. The Examiner's interpretation of Suzuki as allowing operator selection/control of individual robots goes against Suzuki's explicit details of a command log from the WWW server in Figure 6(a) of Suzuki, wherein it is clear that in performing a task the Operation Module, not the operator at a control computer, communicates with individual robots. Suzuki explicitly states:

> "*When the operator requires observation task, the Operation Module broadcasts a task request message to the robot ID '**Cm****'.* Since all of the robots know their own ID, the robots carrying cameras reply to the Operation Module" (Suzuki, page 87, section 5.2, emphasis added).

Therefore, despite the Examiner's interpretation, Suzuki does not state that when the operator requires an observation task, the operator selects/commands an individual robot from a control computer. And, there is no operator selection/control of an individual robot for an observation task from a menu. Suzuki does not provide such a feature.

The Examiner relies on the Control Panel for Individual Robot in Fig. 4 of Suzuki. In Figure 6(a) of Suzuki, **all robots** having a camera (i.e., "***Cm*****"), are specified, not an individual robot selected/controlled by an operator from a control computer. Suzuki explains:

> "Assuming inspection tasks of a plant, we execute an observation task with giving commands to the robots by clicking an object on the environment map shown in Fig. 4.... Figure 6 shows a part of communication logs between the WWW server and the robots. **The WWW server required observation tasks to the robots' ID '**CM***'. The robot 1 and robot 2 which had cameras replied to the WWW server**." (Suzuki, page 88, section 5.3, second paragraph, emphasis added).

This clearly shows that the Control Panel for Individual Robot is not for selecting a robot for a command. The Examiner has not explained how the above passage in Suzuki allows that when the operator requires an observation task, the operator selects/controls an individual robot. There is no mention in Suzuki that an operator specifies an individual robot. It is impermissible for the Examiner to read information into a reference by declaring that a limitation is obvious without providing support in the prior art.

Again, there is no mention or suggestion in Suzuki that an operator controls an individual robot from a control computer. According to Suzuki:

> "The human interface system must coordinate tasks and organize robots. The communication system and protocols have been developed to realize the communication between multi-robots. The organization strategies using the communication system have also developed to realize the cooperation among the robots. The communication between the human interface and multi-robots conforms with the communication strategies" (Section 5.2, page 87, first paragraph).

As Suzuki states, *the human interface system* must coordinate tasks and *organize robots*, not the operators (Section 5.2, page 87, first paragraph, emphasis added). Though the robots are uniquely identified (e.g., "***CmCd01*" representing "omni directional robot No. 1 which has CCD camera and can carry out the task using camera"), the operator does not operate a specific robot from a control computer to perform an observation task. The wildcard notation "*" referred to by the Examiner, is not a wild card identification that can be specified or used by an operator to specify an individual robot. The logs of Figure 6(a) show that Operation Module specifies the wildcard commands, and as detailed above, the operator only specifies tasks without specifying specific robots. The wildcard notation represents a field description as shown in Fig.5, such that: "*The Operation Module* can coordinate tasks or robot organization using the robot's ID" (Suzuki, page 87, section 5.2, emphasis added). Suzuki does not even mention that

the operators have any knowledge of the robot IDs to individually select the robots using their IDs. Nor does Suzuki allow the operator to use wildcards because, as described above in relation to Fig. 6(a), it is the operation Manager that uses wildcards in commands, not an operator.

The Examiner states that in Figure 4 Suzuki shows images from two robots and a dialogue window for inputting commands to specific robots. However, as discussed above, the operator cannot command specific robots, and the logs in Figs. 6(a)-(c) of Suzuki are not from an operator to a robot, rather between the Operation Manager and the robots. Nowhere in Suzuki is it taught or suggested that the dialogue window is used by an operator to command individual robots. And, clearly, images from cameras of individual robots do not teach or suggest such.

The Dialogue Window relied on by the Examiner, is simply to read log reports and receive messages from the Monitoring Module (e.g., see Suzuki, page 87, col. 1, item 8). The Dialogue Window is NOT for receiving commands from the operator to select/control a robot for a task. The Examiner has not shown or established that Suzuki indeed teaches said claimed limitations; rather the Examiner states that one of ordinary skill in the art may interpret Suzuki as teaching the claimed limitations. No prima facie case of obviousness has been established.

As the Examiner also states, Suzuki does not disclose: "detecting presently connected home devices on the home network in an autonomous manner," as required by Claim 9. However, the Examiner states that Fisher discloses such limitations, and modifies Suzuki according to Fisher. This is respectfully traversed. Fisher relates to PnP devices as peripherals for

a PC. Fisher does not disclose detecting presently connected home devices on the home network in an autonomous manner. It is well settled that in order for a modification or combination of the prior art to be valid, the prior art itself must suggest the modification or combination, "...invention cannot be found obvious unless there was some **explicit** teaching or suggestion in the art to motivate one of ordinary skill to combine elements so as to create the same invention." *Winner International Royalty Corp. v. Wang*, No. 96-2107, 48 USPQ.2d 1139, 1140 (D.C.D.C. 1998) (emphasis added). "The prior art **must provide** one of ordinary skill in the art the **motivation** to make the proposed molecular modifications needed to arrive at the claimed compound." *In re Jones*, 958 F.2d 347, 21 USPQ.2d 1941, 1944 (Fed. Cir. 1992) (emphasis added). Neither of the references suggests the motivation to modify or combine the references as proposed. The references are individually complete and functionally independent for their limited specific purposes and there would be no reason to make the modification proposed by the Examiner. Therefore, because neither of the prior art references suggests the combination and modifications proposed by the Examiner for the combination and modifications are improper.

Even if the modification was legally justified, it still would not render Applicants' claimed invention obvious. The Examiner admits that Suzuki does not teach all limitations in Claim 9. Therefore, the Examiner attempts to modify Suzuki in order to teach Applicants' claimed invention. However, as discussed, there is no teaching in the references of the claimed limitations. Fisher is non-analogous art and does not relate to networks. Accordingly, the effort required to combine the teachings of the references would require a substantial undertaking and numerous elements which would not be obvious.

Further, Applicant respectfully submits that the Examiner is improperly using "hindsight" and the teachings of Applicant's own claimed invention in order to combine references to render Applicants' claims obvious. The Examiner admits that Suzuki fails to teach all of the limitations of Applicants' claimed invention. However, the Examiner improperly attempts to modify Suzuki using Fisher (which also fails to teach all of the limitations of Applicant's claimed invention), in an attempt to achieve Applicants' claimed invention.

Further, Suzuki does not require autonomous detection as claimed. Rather, in Suzuki a robot may be connected to the network without autonomous connection being required. And, Suzuki does not teach the step of detecting robots on the network. Clearly then, Suzuki does not need the step of autonomously detecting devices currently connected to the home network. Further, Fisher's PnP description of peripherals for a PC is inapplicable to the robots in Suzuki. How can robots in Suzuki be PnP peripherals for a PC? The combination does not disclose the claimed limitations of autonomously detecting *home devices* that are presently connected to the home network. For at least these reasons, rejection of Claim 9, and all claims dependent therefrom should be withdrawn.

As grounds of rejection for **Claims 12, 17-22, 27-32,** the Examiner states that Suzuki teaches Internet communication which can be fairly interpreted as using a form of dynamic protocol, IP, etc. The Examiner has not shown or established that Suzuki indeed teaches said

claimed limitations, rather the Examiner states that such maybe interpreted as teaching the claimed limitations. No prima facie case of obviousness has been established.

The Examiner has not met the burden of showing that Suzuki discloses that: "signaling the configuration manager that the first home device is connected to the home network includes the step of signaling a dynamic host configuration protocol server that the first home device is connected to the home network," as required by Claim 12. Suzuki does not disclose, nor need, such limitations.

As further grounds for rejecting the claims, the Examiner states that a 1394 bus along with Ethernet, proxies, layers, FCP, are well known constructs within the field of networking at the time of the invention. This is respectfully traversed. No prima facie case of obviousness has been established. Suzuki does not disclose or suggest the claimed limitations. Even if a 1394 bus along with Ethernet, proxies, layers, FCP, were well known constructs within the field of networking (which the Applicant disagrees with), the Examiner has not established under 35 USC 103(a) how, or why, such constructs and Suzuki can be combined to teach the claimed limitations. It is well settled that in order for a modification or combination of the prior art to be valid, the prior art itself must suggest the modification or combination, "...invention cannot be found obvious unless there was some **explicit** teaching or suggestion in the art to motivate one of ordinary skill to combine elements so as to create the same invention." *Winner International Royalty Corp. v. Wang*, No. 96-2107, 48 USPQ.2d 1139, 1140 (D.C.D.C. 1998) (emphasis added). "The prior art **must provide** one of ordinary skill in the art the **motivation** to make the

proposed molecular modifications needed to arrive at the claimed compound." *In re Jones*, 958 F.2d 347, 21 USPQ.2d 1941, 1944 (Fed. Cir. 1992) (emphasis added).

Further, the Examiner has not established that the references alone or in combination, disclose:

"the step of connecting the first home device to the home network includes the step of connecting the first home device to a 1394 serial bus," as required by Claim 17;

"the step of connecting the second home device to the home network includes the step of connecting the second home device to a 1394 serial bus," as required by Claim 18;

"the step of connecting the first home device to the home network includes the step of connecting the first home device to an Ethernet bus," as required by Claim 19;

"the step of connecting the second home device to the home network includes the step of connecting the second home device to an Ethernet bus," as required by Claim 20;

"the step of connecting a first home device to the home network includes the step of connecting the first home device to a first bus; and the step of connecting a second home device to the home network includes the step of connecting the second home device to a second bus; wherein the first bus is connected to the second bus using a bridge proxy, wherein the bridge proxy provides a communication interface between the first bus and the second bus," as required by Claim 21;

"the step of connecting the home network to the Internet," as required by Claim 22;

"the step of connecting the first home device to the home network comprises the step of using an Internet Protocol (IP) and the step of connecting the second home device to the home network comprises the step of using an IP", as required by Claim 27;

"the home network uses a layer other than an IP network layer as a communication layer therefore," as required by Claim 28;

"the home network uses a Function Control Protocol (FCP) for communication," as required by Claim 29;

"receiving user interface data at the first home device over said home network; and the step of controlling the second home device by sending control and command information includes the step of controlling the second home device by sending control and command information over the Internet," as required by Claim 30;

"the first home device is capable of displaying user interface data; the second home device stores user interface data in a selected format that defines a user interface for commanding and controlling of the second home device; receiving the user interface data at the first home device via the home network from the second home device; and displaying the user interface defined by the user interface data on the first home device; such that: the step of accepting user input further includes the steps of accepting user input from a user in response to the user interacting with the user interface displayed on the first home device; and the step of controlling the second home device further includes the steps of controlling the second home device by sending control and command information from the first home device to the second home device based on the user input, the first home device and the second home device both

being operational during the sending of the control and command information," as required by Claim 31; and

"the second home device stores the user interface data as a selected interface data," as required by Claim 32.

Claim 33, was rejected for similar reasons as Claim 9, and should therefore be allowed for at least the reasons provided above in relation to Claim 9. Further, Suzuki does not disclose a first home device containing user interface data that defines a user interface for commanding and controlling the first home device. In addition, as the Examiner also states, Suzuki does not teach a configuration manager. Further, despite the Examiner's interpretation Suzuki does not disclose managing various configurations.

Rejection of Claims 10, 14, 23, 26 under 35 USC 103(a)

Rejection of Claims 10, 14, 23, 26 under 35 USC 103(a) as being unpatenable over Suzuki and Fisher, and further in view of Venkatraman is respectfully traversed because, for at least the following reasons, the references alone or in combination do not disclose all of the claimed limitations.

As per **Claims 10, 14, 23, 26** as the Examiner also states Suzuki does not disclose the second home device stores user interface data, or storing the user interface data as HTML data. HomeVision is non-analogous, and the user must first define devices in the software using various screens, as well as such things as variables, timers and flags (page 1, Sample Device Set-

Up Screen). Then the user sets up Scheduled Events, Periodic Events, Macros, etc., using setup screens. Thereafter, using code writing screens, the user programs "Actions" to take place when an event is activated. HomeVision does not disclose that the second home device stores user interface data. In HomeVision, there is no user activating/controlling a home device from another home device, rather the user uses code writing screens to program actions of devices.

The Examiner interprets Venkatraman to disclose embedding web access in an appliance, whereby access to user interface functions for a device is attained through a device web page located within said device. However, as mentioned, there is no operator control of a robot in Suzuki. There is no use of robot specific user interface in Suzuki. As such, there is no need to store robot specific user interface in a robot. Further, none of Suzuki's robots even include a web page or user interface of any sort.

Suzuki or HomeVision (alone or in combination) cannot be modified by Venkatraman to place links to web pages in robots. Further, there is no need to place web pages in the robots since the robots do not provide user interfaces to be displayed, and as discussed, in Suzuki robot specific information is already provided to the WWW server in Step 8 above and displayed. What is the point/benefit of modifying Suzuki?

Not only there is no benefit in modifying Suzuki per Venkatraman, such a modification would provide a non-functioning system in Suzuki since the robots do not communicate with operators rather they communicate with the Operation Module. Further, there is no motivation

or suggestion in either reference to combine them as the Examiner suggests. For at least these reasons, rejection of Claims 10, 14, 23, 26 and all claims dependent therefrom should be withdrawn.

Rejection of Claims 11, 13, 24, 25 under 35 USC 103(a)

Rejection of claims 11, 13, 24, 25 under 35 USC 103(a) as being unpatenable over Suzuki and Fisher, and further in view of HomeVision is respectfully traversed because, for at least the following reasons, the references alone or in combination do not disclose all of the claimed limitations.

Suzuki does not disclose: "signaling a configuration manager that the first home device is connected to the home network, wherein the configuration manager maintains a list of home devices that are currently connected to the home network," as required by Claim 11. Fisher does not disclose such limitations. As the Examiner also states, Suzuki does not teach maintaining a list of home devices that are currently connected to the home network.

HomeVision does not suggest a configuration manager or maintains a list of home devices that are currently connected to the home network, which list is accessed by the first home device for selectively controlling devices thereon. Further, in HomeVision the user must first define devices in the software using various screens, as well as such things as variables, timers and flags (page 1, Sample Device Set-Up Screen). Then the user sets up Scheduled

Events, Periodic Events, Macros, etc., using setup screens. Thereafter, using code writing screens, the user programs "Actions" to take place when an event is activated.

There is no suggestion in HomeVision of the claimed limitations of maintaining a list of detected devices. Despite the Examiner's interpretation, in HomeVision the user must first define devices in the software using various screens, and there is no steps of creating a list of devices detected as currently connected to the network. Further, in HomeVision, the user may define a device that is not connected to the network, or the user may decide to not define a device that is connected to the network. As such, HomeVision has nothing to do with creating/maintaining a list of detected devices. There is no device selection/access from a list/menu in HomeVision for controlling a device, rather in HomeVision the user using code writing screens to program actions of devices (Sample Event "Action" Screen, page 3).

It is well settled that in order for a modification or combination of the prior art to be valid, the prior art itself must suggest the modification or combination, "...invention cannot be found obvious unless there was some **explicit** teaching or suggestion in the art to motivate one of ordinary skill to combine elements so as to create the same invention." *Winner International Royalty Corp. v. Wang*, No. 96-2107, 48 USPQ.2d 1139, 1140 (D.C.D.C. 1998) (emphasis added). "The prior art **must provide** one of ordinary skill in the art the **motivation** to make the proposed molecular modifications needed to arrive at the claimed compound." *In re Jones*, 958 F.2d 347, 21 USPQ.2d 1941, 1944 (Fed. Cir. 1992) (emphasis added). Neither of the references suggests the motivation to modify or combine the references as proposed. The references are

individually complete and functionally independent for their limited specific purposes and there would be no reason to make the modification proposed by the Examiner. Therefore, because neither of the prior art references suggests the combination and modifications proposed by the Examiner for the combination and modifications are improper.

Even if the modification was legally justified, it still would not render Applicants' claimed invention obvious. The Examiner admits that Suzuki does not teach all limitations in Claim 13. Therefore, the Examiner attempts to modify Suzuki in order to teach Applicants' claimed invention. However, as discussed, there is no teaching in the references of the claimed limitations. HomeVision is non-analogous art. Accordingly, the effort required to combine the teachings of the references would require a substantial undertaking and numerous elements which would not be obvious.

Further, Applicant respectfully submits that the Examiner is improperly using "hindsight" and the teachings of Applicant's own claimed invention in order to combine references to render Applicant's claims obvious. The Examiner admits that Suzuki fails to teach all of the limitations of Applicant's claimed invention. However, the Examiner improperly attempts to modify Suzuki using HomeVision (which also fails to teach all of the limitations of Applicant's claimed invention), in an attempt to achieve Applicant's claimed invention. There is no motivation in maintaining a list of home devices that are currently connected to the home network in Suzuki or HomeVision, alone or in combination.

Further, the Examiner has not established that the references alone or in combination, disclose:

"the first home device performs the further step of accessing the list of home devices maintained by the configuration manager," as required by Claim 13;

"connecting the second home device to the home network includes the step of signaling a configuration manager that the second home device is connected to the home network, wherein the configuration manager maintains a list of home devices that are currently connected to the home network," as required by Claim 24; and

"signaling the configuration manager that the second home device is connected to the home network includes the step of signaling a dynamic host configuration protocol server that the second home device is connected to the home network," as required by Claim 24.

CONCLUSION

If the Examiner believes that telephone interview will help further the prosecution of this case, Applicant respectfully requests that the undersigned attorney be contacted at the listed telephone number.

If necessary, the Commissioner is hereby authorized to charge payment or credit any overpayment to Deposit Account No. 01-1960 for any additional fees required in connection with this filing. A duplicate copy of this page is enclosed for such purpose.

Certificate of Mailing

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: MS Amendment Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on May 4, 2006.

By: Sarah A. Nielsen

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May 4, 2006

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